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5 IN THE UNITED STATES DISTRICT COURT
6
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

Case No. 23-md-03084-CRB

11 This Document Relates to:

12 *Jaylynn Dean v. Uber Techs., Inc.*,
13 N.D. Cal. No. 23-cv-06708
14 D. Ariz. No. 25-cv-4276

**DECLARATION OF ROOPAL P.
LUHANA, ESQ. IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' MOTION TO STRIKE
PLAINTIFF'S WITNESS AND EXHIBIT
LISTS**

Judge: Honorable Charles R. Breyer

1 I, Roopal P. Luhana, hereby declare as follows:

2 1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the State of New
3 York and duly admitted to practice before this Court, representing Plaintiffs in the above captioned
4 action.

5 2. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion
6 to Strike Plaintiff's Witness and Exhibit List.

7 3. Plaintiff has informed Defendants that she will serve a narrowed exhibit list today.
8 Plaintiff has also proposed exchanging final exhibit lists on December 30 (when final witness lists
9 are being exchanged), two weeks before trial begins.

10 4. Plaintiff prepared her witness and exhibit lists in good faith consistent with the
11 Court's expectation that parties would act in good faith rather than with artificial numerical limits.

12 5. Plaintiff has advised Uber that Plaintiff will de-duplicate and substantially reduce
13 the exhibit list within the agreed timeframe.

14 6. Discovery for this first trial case has been ongoing.

15 7. Plaintiff's list consists of: (1) 28 witnesses who will or may testify by video
16 designation, for which Uber will receive the designations in advance; (2) three Uber witnesses
17 whom Uber has refused to make available for live testimony and therefore may testify by video
18 designation only; (3) 10 live expert witnesses; (4) 10 witnesses who may testify live or by video;
19 (5) live testimony by Plaintiff Dean and Mr. Bagby (a hotel clerk with limited but important
20 eyewitness testimony); and (6) two placeholders.

21 8. Uber included more than 110,000 entries on its privilege logs. Plaintiffs challenged
22 approximately 35,000 of those designations, and after review by Judge Cisneros and Special
23 Master Jones, approximately 29,000 documents were de-designated in whole or in part.

24 9. Defendants have clawed back documents in the middle of depositions or after
25 documents have been used at depositions.

26 10. Defendants have clawed back documents they previously de-designated and clawed
27 back documents their own experts have relied upon.
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Executed this 17th day of December, 2025 in Pittsburgh, Pennsylvania.

/s/ Roopal P. Luhana

Roopal P. Luhana